

COHEN & GREEN

April 10, 2023

Hon. Frederic Block, Senior Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East, 1214 South
Brooklyn, New York 11201

By Electronic Filing.

Re: Velez v. Prusayev, 22-CV-1810 (FB) (VMS)

Dear Judge Block:

I am co-counsel for Plaintiffs in the above-captioned matter. I write, with Defendants' consent per the Court's Motion Rule 1(D), to request an extension of 30 more days to apply for costs (inclusive of attorneys' fees under 42 U.S.C. § 1988), consistent with the judgment entered in this case. *See* ECF No. 28. Per the Court's most recent Order, the current deadline is April 10, 2023. Plaintiffs previously applied for five extensions (ECF Nos. 29, 30, 31, 32, and 36) which the Court granted, making this the sixth extension.

As far as the reason for the extension, I am pleased to report the parties have an agreement on the amount of fees in principle, and this extension is simply to ensure there is sufficient time to paper that agreement. While we have reached an agreement, we are discussing some minor issues over the language — and are all hopeful we can reach an agreement shortly.

As always, I thank the Court for its time and attention to this matter.

Respectfully submitted,

/s/

J. Remy Green

Honorific/Pronouns: Mx., they/their/them

COHEN & GREEN P.L.L.C.

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cc:

All relevant parties by ECF.